

Missouri United School Insurance Council

12444 Powerscourt Drive,
Suite 500
St. Louis MO, 63131

Gallagher Bassett Property and Liability Claims Team

Insured:

Pleasant Hill R-III School District and
The Board of Education
318 Cedar Street
Pleasant Hill, MO
64080
816-540-3161

Defendants sued in their Official and Individual Capacities:

Superintendent Steven Meyers
Assistant Superintendent Suzanne Brennaman
Director of Special Services Lauren Goddard
Section 504 Building Coordinator Terri Zimmerschied
Elementary Principal Kayla Taylor

Defendant sued in Official Capacity only:

The PHSD Board of Education

December 20, 2022

Dear Broker,

This letter is to ensure that you have received notice of a potential claim regarding the above-named insured. Notice of a potential lawsuit for Section 504 Retaliation and Due Process violations was served upon the insured on May 16, 2021, after the Defendants refused to apologize and withdraw an inappropriate report to the Children's Division regarding a disabled child's medically excused absences.

A lawsuit was subsequently filed against the insured in Federal District Court on April 6, 2022, under Case No. 4:22-CV-00229-HFS and seeks injunctive and monetary relief totaling twelve million dollars.

The law firm of Guin Mundorf LLC made an entry of appearance on approximately June 6, 2022, but did not provide the insured's liability policy until just this month. While we trust that

the Pleasant Hill School District properly notified their insurer of a potential liability, we feel it would be irresponsible of us if we did not follow up with a notice of our own.

A settlement offer of 10% of the requested monetary relief and discipline of PHSD staff/administration was rejected by Guin Mundorf LLC early on in this dispute, and they have declined to engage in alternative dispute resolution options.

We are now in the summary judgment stage of the lawsuit, and unfortunately, Guin Mundorf LLC failed to engage in discovery until after that motion was filed.

Due to their personal knowledge and involvement with allegations in the lawsuit regarding manufactured evidence, we have concerns that Guin Mundorf LLC has not been authorized by the insurer to represent the defendants. We did question Defense Counsel if they had authorization to represent all Defendants in their official and individual capacities but did not receive a straight answer. Apologies in advance if that is an inappropriate question.

Thank you for your time.

Pro Se Plaintiff in the above referenced case,

Michele Koch